

CONSUMER PROTECTION

SCOT GANOW 937.641.2041 sganow@taftlaw.com

November 1, 2021

# VIA FEDERAL EXPRESS

# **CONFIDENTIAL**

Attorney General John M. Formella Office of the Attorney General 33 Capitol Street Concord, NH 03301

RE: G&J Pepsi-Cola Bottlers, Inc.

To Whom It May Concern:

In accordance with New Hampshire Revised Code §359-C:19, et. seq., I am providing the following notice of a security incident on behalf of our client, G&J Pepsi-Cola Bottlers, Inc. ("G&J").

Name and Contact Information of Person Reporting the Security Incident.

Scot Ganow, Esq., CIPP/US
Outside Counsel to G&J
Taft Stettinius & Hollister LLP
40 North Main Street, Suite 1700
Dayton, Ohio 45423
937-641-2041
sganow@taftlaw.com

Brief Description of Incident. On September 9, 2021, G&J first learned of a cyberattack that partially disrupted its information systems (the "Incident"). Based on G&J's investigation, it learned that the cyberattack was made possible by use of malicious software on its systems. Based on G&J's incident response procedures, G&J believes it interrupted a larger attempt to completely shut down its systems and demand a ransom from the company. Since learning about the Incident, G&J worked with a third-party forensics firm to secure all systems, remediate any risks and securely and methodically bring its systems back online. In addition to confirming the interference and disruption of some G&J information systems, on October 4, 2021, G&J's investigation also determined that the Incident may have also resulted in the unauthorized access

or viewing of certain personal information on some G&J file systems. The impacted individuals are G&J employees, former employees, and some employees' beneficiaries and dependents. Since that time, G&J has been analyzing the large number of impacted files to understand what personal information was potentially at risk and working to provide notice to individuals and authorities, as applicable.

<u>Information Compromised</u>. According to G&J's investigation, it was possible that certain personal information was accessed by the unauthorized third party. Such personal information could include the following data:

- First and last name;
- Social Security number; and
- Date of birth.

Company Response. Upon learning of the Incident, G&J engaged a third-party forensic investigation firm to identify the scope of the Incident and to assist it with securing its systems and data. G&J has carefully brought its systems back online and it continues to closely monitor its network and information systems for unusual activity. G&J is continuing its investigation and due diligence, including engaging additional resources and experts and evaluating the extent of risk to personal information. Additionally, immediately following the Incident, G&J implemented the following remedial actions:

- Forced all employee passwords to be changed;
- Closed all administrator accounts and created new accounts with new passwords;
- Added an additional layer of endpoint protection on all company servers;
- Took offline approximately 100 computers and completely cleaned and re-imaged those computers;
- Implemented full-system backups on a 12/24 hour basis; and
- Implemented other additional administrative safeguards.

G&J will continue to implement any remaining recommendations from the third-party forensics firm to further assist G&J in developing its administrative, technical, and physical safeguards to further improve G&J security across the company.

<u>Number of Affected Individuals in New Hampshire</u>. The investigation identified one individual with a New Hampshire address that may have been impacted. In the event that G&J determines any additional New Hampshire residents are impacted, G&J shall update this notice accordingly.

Notice to Affected Individuals. An electronic copy of the notice to the affected individuals is attached. The notice will be mailed by G&J during the week of November 1, 2021, via first class U.S. mail.

<u>Credit Monitoring Services</u>. Yes, one year of complimentary credit monitoring and identity theft protection services will be provided through Experian. Please see the credit monitoring information in the notice to the New Hampshire residents for more information on Experian's services.



[Date]

[First Name Last Name]
[Address]
[City, State Zip]

Dear [First Name],

## **Notification of Security Incident**

G&J Pepsi-Cola Bottlers, Inc. ("G&J", "we" or "our") takes the security and protection of your personal information seriously. Through the investigation of a security incident, unauthorized access or viewing of your personal information <u>may</u> have occurred. At this time, we have no evidence that your personal <u>information has been accessed, viewed, or stolen</u>. However, in an abundance of caution, we are notifying you so that you can better protect yourself as the unauthorized access to your personal information was possible based on the nature of the security incident and our investigation.

## What Happened

On September 9, 2021, we first learned of a cyberattack that partially disrupted G&J information systems (the "Incident"). Based on our investigation, we have learned that the cyberattack was made possible by use of malicious software on our systems. Based on our incident response procedures, we interrupted a more significant attempt to shut down our systems and demand a ransom from the company. Since learning about the Incident, we worked with a third-party forensics firm to secure all systems, remediate any risks, and securely and methodically bring our systems back online. In addition to confirming the interference and disruption of some G&J information systems, on October 4, 2021, our investigation also determined that the Incident may have resulted in the unauthorized access or viewing of your personal information on some G&J file systems. Since then, we have been analyzing impacted files to understand what personal information may be at risk and working to provide notice to individuals and authorities, as applicable.

### What Information Was Involved

At this time, we cannot determine whether your personal information was impacted due to the Incident. Based on our investigation to date, we can only indicate the following types of personal information for G&J employees, dependents and beneficiaries that were potentially accessed or viewed.

First and last name	Social Security number	Date of birth	

#### What We Did and What We Are Doing

Upon learning of the Incident, we engaged a third-party forensic investigation firm to identify the scope of the Incident and to assist us with securing our systems and data. We have carefully brought our systems back online and we continue to closely monitor our network and information systems for unusual activity. Additionally, we are continuing our investigation and due diligence, including engaging

additional resources and experts and evaluating the extent of risk to personal information. We will continue to implement the recommendations from the third-party forensics firm to further assist G&J in developing its administrative, technical, and physical safeguards to further improve G&J security across the company.

## What You Can Do

While we have received no reports or indication of such activity, the risks related to the unauthorized use of a Social Security number may include identity theft, financial fraud, and tax fraud. Please be vigilant about monitoring your personally identifiable information, particularly your credit report information and financial accounts, to protect against fraudulent activity. Please also pay attention when submitting tax returns to protect against possible fraudulent submissions made on your behalf.

Complimentary Credit Monitoring and Call Center. To assist you in this effort, we have provided complimentary credit monitoring and identity theft prevention services through Experian. If you are concerned about identity theft, please sign up for the complimentary monitoring and protection services by following the instructions provided below from Experian. If you need additional information, we have established a call center to answer any questions you might have. To access the call center at no charge, please use the following phone number: (855) 919-2743 Monday through Friday from 6:00 am to 8:00 pm PST; Saturdays and Sunday from 8:00 a.m. to 5:00 p.m. PST (excluding major US holidays).

If you are concerned about identity theft, you may also contact local law enforcement and file a police report. You can contact your state's Attorney General, as well as the Federal Trade Commission or one of the credit bureaus for more information about how to protect your identity.

## For More Information

If you are concerned about identity theft, you can place an identity theft/fraud alert, get credit freeze information for your state, or order a free credit report by calling any of the following credit reporting agencies at one of the phone numbers listed below or by visiting their websites.

Equifax	Experian	TransUnion
1- 888-548-7878	1-888-397-3742	1-800-680-7289
P.O. Box 740256	P.O. Box 4500	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19022
https://www.equifax.com/persona	https://www.experian.com/hel	https://www.transunion.com/cre
1/credit-report-services/	<u>p/</u>	dit-help

<u>Credit Reports</u>. You can request credit reports from all three credit bureaus be sent to you free of charge. Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Thieves may hold stolen information to use at different times. Checking your credit reports periodically can help you spot problems and address them quickly.

<u>Fraud Alerts</u>. You can place a fraud alert with the credit bureaus free of charge. A fraud alert tells creditors to contact you before they open any new accounts or change your existing accounts. Contact any one of the three major credit bureaus. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts. The initial fraud alert stays on your credit report for one year. You can renew it after one year. You may also place an extended fraud alert, which lasts up to seven years unless you cancel it sooner. Additionally, you can provide a phone number instructing lenders to contact you if someone applies for credit in your name, and you will get an instant alert to potential fraud.

<u>Security Freeze</u>. Under state law, a security freeze (or a credit freeze) prohibits a credit-reporting agency from releasing any information from a consumer's credit report without written authorization. There is no fee associated with freezing or thawing your credit. The process of freezing your credit takes only a few minutes. You must contact each credit bureau individually to freeze your credit with each agency. You may need to provide the following information:

Your full name	Date of Birth	Social Security number	Mobile number
Postal address	Email address	Other information the Credit Reporting Agency may require.	

The credit-reporting agencies have one business day after your request to place a security freeze if made by telephone or secure electronic means. If the request is made by mail, the credit-reporting agencies have three business days. The credit agencies must also send written confirmation to you within five business days.

To lift the security freeze, in order to allow a specific entity or individual access to your credit report, you must apply online, call, or send a written request to the credit-reporting agencies by mail. When you contact a credit bureau to lift the security freeze, you will need to include proper identification (name, address, and Social Security number) and the PIN number or password that was provided to you (if provided) when you placed the security freeze as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. If you request a credit thaw online or by phone, the credit bureaus are required by law to complete the request within one hour. If you request the thaw by regular mail, the credit bureaus have three business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

The FTC provides more information about how to protect your identity at either https://www.ftc.gov/ or https://www.identitytheft.gov/. You may also find additional information on any applicable rights under the Fair Credit Reporting Act. You can also contact the FTC by using the information below.

Federal Trade Commission 1-202-326-2222 Bureau of Consumer Protection 600 Pennsylvania Avenue, NW Washington, DC 2058

For District of Columbia Residents: You may also contact the Attorney General for the District of Columbia for more information about how to protect your identity by using the information below:

Attorney General Karl A. Racine 400 6th Street, NW Washington, DC 20001 Phone: (202) 727-3400 Website: https://oag.dc.gov/

For New York Residents: You may also contact the New York Attorney General's Office for more information about how to protect your identity by using the information below:

<u>For Maryland Residents</u>: You may also contact the Maryland Attorney General's Office for more information about how to protect your identity by using the information below:

Attorney General Brain E. Frosh 200 St. Paul Place Baltimore, MD 21202 Phone: 410-528-8662

Website: https://www.marylandattorneygeneral.gov/

<u>For North Carolina Residents</u>: You may also contact the North Carolina Attorney General's Office for more information about how to protect your identity by using the information below:

Attorney General Josh Stein

Attorney General Letitia James
Toll Free Phone Number:

(800) 771-7755

Website: https://ag.ny.gov/

9001 Mail Service Center Raleigh, NC 27699-9001

Website: https://ncdoj.gov/

Toll Free in NC: 1-877-566-7226 Outside NC: 919-716-6000

For Rhode Island Residents: You may also contact the Rhode Island Attorney General's Office for more information about how to protect your identity by using the information below:

Attorney General Peter F. Neronha Toll Free Phone Number: (401) 274-

4400

Website: http://www.riag.ri.gov/

Again, we sincerely regret that this has occurred. If you have any questions, please contact us at:

G&J Pepsi-Cola Bottlers, Inc., 9435 Waterstone Blvd., Ste. 390 Cincinnati, OH 45249 (855) 919-2743

Sincerely,

Tim Trant, CEO

# **Experian – Credit Monitoring Information**

To help protect your identity, we are offering a complimentary \_\_\_-month membership of Experian's® IdentityWorks<sup>SM</sup>. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you enroll by: February 28, 2022 (Your code will not work after this date.)
- Visit the Experian Identity Works website to enroll: www.experianidworks.com/credit
- Provide your activation code: [code]
- If you are a minor please review enrollment information below

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (855) 919-2743 by February 28, 2022. Be prepared to provide engagement number [engagement #] as proof of eligibility for the identity restoration services by Experian.

Additional details regarding your -month Experian IdentityWorks Membership:

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.\*
- Credit Monitoring: Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE**<sup>TM</sup>: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- Up to \$1 Million Identity Theft Insurance\*\*: Provides coverage for certain costs and unauthorized electronic fund transfers.
- \* Offline members will be eligible to call for additional reports quarterly after enrolling
- \*\* The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

## Experian - Minor Monitoring Information

To help protect your minor's identity, we are offering a complimentary x-month membership of Experian's® IdentityWorks<sup>SM</sup>. This product provides superior identity detection and resolution of identity theft. To activate this membership and start monitoring your minor's personal information please follow the steps below:

- Ensure that you enroll by: February 28, 2022 (Your code will not work after this date.)
- Visit the Experian Identity Works website to enroll: www.experianidworks.com/minorplus
- Provide your activation code: [code]
- Provide your minor's information when prompted

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks for your minor:

- Social Security Number Trace: Monitoring to determine whether enrolled minors in your household have an Experian credit report. Alerts of all names, aliases and addresses that become associated with your minor's Social Security Number (SSN) on the Experian credit report.
- **Internet Surveillance**: Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- Identity Restoration: Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE**<sup>TM</sup>: Receive the same high-level of Identity Restoration support even after the Experian IdentityWorks membership has expired.

Up to \$1 Million Identity Theft Insurance\*: Provides coverage for certain costs and unauthorized electronic fund transfers.

If you have questions about the product, need assistance with identity restoration for your minor or would like an alternative to enrolling in Experian Identity Works online, please contact Experian's customer care team at (855) 919-2743 by February 28, 2022. Be prepared to provide engagement number [engagement #] as proof of eligibility for the identity restoration services by Experian.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (855) 919-2743. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for \_\_ months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at <a href="www.ExperianIDWorks.com/restoration">www.ExperianIDWorks.com/restoration</a>. You will also find self-help tips and information about identity protection at this site.

<sup>\*</sup> The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.